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**IN THE UNITED STATES DISTRICT COURT,
FOR THE DISTRICT OF WYOMING**

RUDOLF DEHAAN,

Plaintiff,

vs.

Civil Case No. 07-CV-0257-J

**PERRY ROCKVAM, individually and as
representative for CODY POLICE
DEPARTMENT, and CODY POLICE
DEPARTMENT, and SCOTT A. STEWARD,
individually and as representative for PARK
COUNTY SHERIFF'S DEPARTMENT AND
DETENTION CENTER, and PARK COUNTY
SHERIFF'S OFFICE AND DETENTION
CENTER, and OFFICER TORIN
CHAMBERS, and JOHN DOES #1-#6,**

Defendants.


**PLAINTIFF'S MOTION FOR LEAVE TO AMEND THE COMPLAINT
BASED UPON INFORMATION OBTAINED DURING DISCOVERY**

Plaintiff, Rudolf Dehaan, by and through his attorneys, Nicholas H. Carter and Stephanie M. Humphrey, The Nick Carter Law Firm, P.C., hereby respectfully move the Court to allow Plaintiff to amend his Complaint to reflect information that was discovered during the discovery process. Plaintiff would further inform the Court of the following:

1. Plaintiff named John Does 1 through 6 in his initial Complaint.
2. Plaintiff anticipated finding out the names of potentially several Defendants, previously unknown to the Plaintiff, during the discovery process.
3. Plaintiff has determined, based upon the information received during discovery process that two of the John Does should and can be named at this time.
4. John Doe #1 should now be known as Officer Jason Stafford of the Cody Police Department.
5. John Doe #2 should now be known as Officer Beck (first name still unknown) of the Cody Police Department.

WHEREFORE, the Plaintiff would request that the Complaint be amended to name as parties Officer Stafford and Officer Beck.

Respectfully submitted this 13th day of June, 2008.



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CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of June, 2008, the foregoing Plaintiff's Motion for Leave to Amend the Complaint Based Upon Information Obtained During Discovery was electronically filed with the Court and then served upon the following by fax and a hard copy was mailed to their address:

Bruce A. Salzburg

Attorney General

John W. Renneisen

Deputy Attorney General

Christine Cox

Senior Assistant Attorney General

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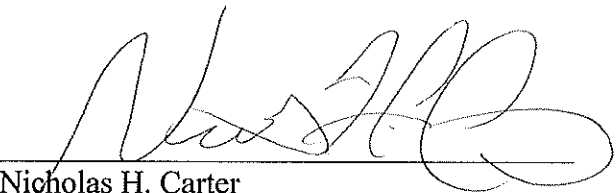
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